

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

REGINALD CLAY,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:24-cv-4194
v.	)	
	)	District Judge Georgia N. Alexakis
UNION PACIFIC RAILROAD	)	Magistrate Judge Jeffrey N. Cole
COMPANY,	)	
	)	
Defendant.	)	

**PLAINTIFF’S UNOPPOSED MOTION  
SEEKING ENTRY OF AN ORDER STAYING THE CASE**

Plaintiff Reginald Clay (“Plaintiff”) respectfully requests that the Court enter an Order staying the case. In support thereof, Plaintiff states:

1. On May 8, 2025, Defendant Union Pacific Railroad Company (“Defendant”) filed its Opposed Motion to Certify the Court’s April 10, 2025 Order for Interlocutory Appeal. (Dkt. No. 58)

2. On May 9, 2025, the Parties submitted a joint status report, wherein Plaintiff requested that the Court extend the deadline for fact discovery to be completed by 90 days to September 4, 2025. (Dkt. No. 61)

3. On May 12, 2025, this Court entered a Minute Entry stating, in part: “The Court grants plaintiff’s request that the current fact discovery deadline be extended until 9/4/25. The Court stays all oral discovery (i.e., depositions) pending resolution of defendant’s motion seeking certification for an interlocutory appeal. Written discovery, however, may proceed. The Court will revisit the issue of a discovery stay upon resolution of the aforementioned motion.” (Dkt. No. 62)

4. On June 10, 2025, the Court entered a Memorandum Opinion and Order granting Defendant's motion for certification. (Dkt. No. 66) The Court also entered a Minute Entry stating that "[i]f [the Seventh Circuit grants Defendant's request for interlocutory review], the Court will stay the case pending interlocutory review. Until the Seventh Circuit resolves any request for interlocutory review, however, the parties must continue their progress on written discovery." (Dkt. No. 65)

5. On July 10, 2025, the Seventh Circuit granted Defendant's petition for permission to appeal. (Dkt. No. 67)

6. While this Court indicated in its June 10, 2025, Minute Entry that the case would remain stayed pending interlocutory review, the Court has not formally ordered that the case, and all deadlines, remain stayed.

7. Plaintiff's counsel has conferred with Defendant's counsel who do not oppose this motion or the relief sought herein.

WHEREFORE, Plaintiff respectfully requests that the case be stayed pending interlocutory review and respectfully requests that the Court enter an order stating the same.

Respectfully submitted,

/s/ Alexandra R. Huzyk  
Alexandra R. Huzyk

Daniel A. Edelman  
Dulijaza (Julie) Clark  
Alexandra Huzyk  
**EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC**  
20 S Clark Street, Suite 1800  
Chicago, IL 60603  
(312) 739-4200  
(312) 419-0379 (FAX)  
[courtecl@edcombs.com](mailto:courtecl@edcombs.com)  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I, Alexandra R. Huzyk, hereby certify that on Friday, August 29, 2025, I caused a true and accurate copy of the foregoing document to be filed via the Court's CM/ECF online system, which sent notice via email to all counsel of record.

/s/Alexandra R. Huzyk  
Alexandra R. Huzyk